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Attorneys for Defendants

**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION**

GLOBAL FREIGHT SYSTEMS CO. W.L.L.;
GAMA CENTER; and GENOA PLASTIC
INDUSTRIES,

Plaintiffs,

vs.

AL-MORRELL DEVELOPMENT, L.L.C. and
PAUL A. MORRELL,

Defendants.

**DEFENDANTS' OBJECTIONS TO
PLAINTIFF GLOBAL FREIGHT
SYSTEMS CO. W.L.L.'S PRETRIAL
DISCLOSURES**

Case No. 1:14-cv-00133-TC
Honorable Tena Campbell

COMES NOW Defendants Al-Morrell Development, L.L.C. (“AMD”) and Paul A. Morrell (“Mr. Morrell”) (collectively referred to as “Defendants”), and submit the following objections to Plaintiff Global Freight Systems Co. W.L.L.’s (“Global Freight”) Pretrial Disclosures filed with the Court and served upon counsel for the Defendants on March 11, 2016.

I. WITNESSES

Global Freight states it may call Martin Petersen by deposition, but does not cite specifically what deposition testimony of Mr. Petersen they will use at trial. Defendants object to this designation, for it is doubtful that all of Mr. Petersen's deposition testimony will be of use to the Court or relevant to the issues to be tried. Designation of Mr. Petersen's deposition in its entirety places an undue burden on Defendants to the extent it requires Defendants to assert objections throughout the deposition, including to testimony that Global Freight will not use at trial. Defendants anticipate that Global Freight will offer more specific citations to, or excerpts from, Mr. Petersen's deposition during trial. Defendants reserve the right to assert any objections at that time. Until such time, Defendants object Mr. Petersen's testimony by deposition in its entirety upon all available grounds for exclusion. Defendants do not object to the other witnesses designated by Global Freight.

II. EXHIBITS

A. Exhibits Global Freight expects to offer at trial

Ex. No.	Document Description	Bates No./Identification	Objection
P1	Service Provider Agreement	GFS Genoa Gama 00012-17 (Depo Ex. 7)	None
P2	Global Freight Invoices	GFS Genoa Gama 00069, 00001, 00005-10, 00067-68, 00002-4, 00011, 00020, 00018-19, 00021-22	Foundation
P3	Summary of Invoices	GFS Genoa Gama 00059	Foundation
P4	June 27, 2012 – July 27, 2012 Emails between Corey Larsen and Anthony Dsouza	GFS Genoa Gama 00023-25	Relevance
P5	April 11, 2012 – June 27, 2012 Emails between Anthony Dsouza and Al-Morrell Development	GFS Genoa Gama 00026-	Relevance

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P6	December 10, 2012 Email from Paul Morrell to Richard Altman	GFS Genoa Gama 00130 (Depo Ex. 11)	None

B. Exhibits Global Freight may offer at trial

Ex. No.	Document Description	<u>Bates No./Identification</u>	<u>Objection</u>
P7	Video re: Entrepreneur of the Year		Foundation; Relevance
P8	Assets Sales Agreement	AMD 0022-25 (Depo Ex. 3) & Excel spreadsheet produced by Defendants on 8/7/2015	None
P9	Federation of Iraqi Chambers of Commerce Reservation of a Commercial Name	AMD 0026-30	Foundation; Authentication
P10	Investment License for Oasis Water International Co.	GFS Genoa Gama 00116, 122, 136	Foundation; Hearsay; Authentication
P11	Defendants' Responses to Plaintiff Global Freight Systems Co. W.L.L.'s Request for Production of Documents and 8/7/2015 Certificate of Mailing		None
P12	August 7, 2015 Letter from Christian Hansen to Jessica Wilde		Relevance
P13	Registered Principals of Al-Morrell Development as of 8/29/2014 and Articles of Organization of Al-Morrell Development	Depo Ex. 15	Foundation and Authentication as to Registered Principals of Al-Morrell Development as of 8/29/14. None as to Articles of Organization of Al-Morrell Development
P14	Utah Department of Commerce Listing for Al-Morrell Development	GFS00168	Foundation; Hearsay; Authentication

P15	Amendment of Articles of Organization for Al-Morrell Development	GFS Genoa Gama 00128-129 (Depo Ex. 8)	Relevance
P16	Deseret News Article: "Entrepreneur of the Year finalist: Paul Morell, Al-Morrell Development"	GFS Genoa Gama 00138-139	Foundation; Hearsay; Relevance
P17	Morrell International website pages	GFS Genoa Gama 00141-146	Foundation; Hearsay; Relevance
P18	Al-Morrell Development Purchase Orders	GFS 00181-184	Foundation; Hearsay
P19	November 9, 2012 Letter to Paul Morrell	GFS Genoa Gama 00053-54	Foundation; Hearsay
P20	January 3, 2012 Email from Paul Morrell to Phil Morrell	AMD 0014 - 15 (Depo Ex. 6)	None
P21	November 12, 2012 Emails between Mohan Janardhan and Alan Morrell	AMD 0178-182 (Depo Ex. 5)	None
P22	December 31, 2011 Emails between Paul Morrell and George Flint, info@saiflaw.com, essam@alessamgroup.com, salahosseiran@bpcholding.com	AMD 0012-13 (Depo Ex. 4)	None

Notwithstanding the foregoing, Defendants reserve the right to object to any exhibit on the grounds of relevance under Fed. R. Evid. 402 or 403 at the appropriate time. Fed. R. Civ. P. 26(a)(3)(B).

DATED this 25th day of March, 2016.

Respectfully submitted,
HILLYARD, ANDERSON & OLSEN, P.C.

/s/ R. Christian Hansen
Gary N. Anderson
R. Christian Hansen
ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF SERVICE

I hereby certify that on the 25th day of March, 2016 I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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/s/ R. Christian Hansen